

United States District Court
Eastern District of New York

-----X

15CV3462
May 25, 2017
Letter Motion

Jacqueline Silver

Plaintiff,

---against---

Sergeant Scott Dalessandro, Police Officer
Luigi Galano, Police Officer Nicholas Kostas
And Police Officer Edward Stine,

Defendants ,

I am the plaintiff in the above referenced action. I am writing this Letter Motion to ask the court to extend the discovery until July 13th . Plaintiff spoke with Kaitlin Fitzgibbons Corporation Counsel for the police officers and told me that she consents to the limited discovery being extended to July 13, but told me that I need the courts consent to do this.

Your Honor, plaintiff had to subpoena her own Verizon Wireless records which is supposed to be mailed to my P.O. Box in Bayside by June 5th . I also need

time to produce my witnesses for my diligence. I also need to go through my notes of over two years. Plaintiff respectfully wishes that she is granted the extension for the limited discovery in order for her to finish her diligence.

Your Honor, on March 29th of this year I submitted to the prose office a notice of motion to hold Victor and Susan Wortman in contempt for failure to answer the subpoena that was personally served on them on December 26th of last year . Plaintiff respectfully is asking the court to rule on this motion. Plainiff will like to use these documents that are in the possession of the Wortmans to prove to the court that she did diligence in getting the names of the police officers.

Plaintiff has known the Wortmans' for over fifteen years. She has been in contact with Mr. Wortman on and off for the last fifteen years. I have been consistently in communications with him since February 2012, three months before Jennifer Silver –sister put me in the hospital. From that point on Mr. Wortman had diligently tried to help me to find out how I got into a hospital while sitting in my car on the side of my house on May 27th 2012.

Mr. Wortman is the Cantor in the Bay Terrace Jewish Center and has claimed that he had many contacts to help me find out information about who put me in the hospital , why and how, which I figured would lead to the names of the cops. He has said stuffto me in the past that he would only know if he had my medical records. He also mentioned to me about a police report that I can use for this case, which might have more information than the aided report that the

Corporation Counsel supplied me with. As plaintiff mentioned in her motion for contempt, Mr. Farina, an attorney and longtime friend returned a call from Mr. Fine who claimed to be Mr. Wortmans attorney. He told Mr. Farina that he wasn't going to respond to the subpoena at this point. He was also served a copy of the contempt motion and to this day Mr. Fine Esq. hasn't responded.

On mothers day , I had a conversation with Victor Wortman and we discussed his representation. He advised me that Susan Wortman and Victor Wortman are represented by Mr. Fine. The next day I had a conversation with Susan Wortman. She sent me a letter at the end of March about the documents. At this point Hon. Ross I don't know if that was her answer as she doesn't know either, she was confused. She made it clear that Mr. Fine isn't her lawyer as he does not practice in federal court. She went on to tell me that the documents could possibly be in the synagogue where her husband is a Cantor. Susan told me multiple times that she is an honest person, plaintiff will have to believe her.

Another reason Your Honor why I need more time on the discovery is that the Bay Terrace Jewish Center will be served a subpoena to produce my documents. This week is difficult because of memorial day and then the Jewish holiday on Wednesday and Thursday.

Wherefore , Ms. Silver respectfully prays if you can rule on this motion so she can get her documents and move on to the diligence for her limited discovery.

Jackie Silver
Prose Plaintiff